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Public Comment on Discussion Draft, dated 4/19/17

Thank you for this opportunity to comment on your discussion draft.

In my view, the proposed amendments do not adequately address two important issues:

1. The State Water Resources Control Board has issued Phase 1 Draft of the Bay-Delta Plan.
2. Various government and academic researchers have updated their projections of climate change, especially regarding sea-level rise.

The State Water Resources Control Board (SWRCB) has issued Phase 1 Supplementary Environmental Document (SED), proposing increased flows in the Stanislaus, Merced and Tuolumne Rivers. The release of this important document is not included in your timeline of events.

1. The SWRCB is now preparing Phase 2, which will focus on the Sacramento Rivers and Delta outflows. That draft is expected in September. It is possible that the Phase 2 SED will require increased flow levels into and through the Delta from the Sacramento River.

This is not idle speculation. Phase 1 requires roughly a doubling of flows from the Merced, Stanislaus, and Tuolumne Rivers. If that type of requirement appears in Phase 2, the proposed tunnels won't have enough water to justify their expense.

This represents a huge, unknown risk facing these amendments. If nothing else, the amendments need to be edited to reflect the potential and significant impact that increased Sacramento River flows might have on the viability of future conveyance projects.

2. Sea-level rise is another huge risk any future Delta conveyance project faces. According to research presented by California Water Research, the infrastructure associated with the WaterFix tunnels project is based on a sea-level rise of 18 inches over the next 50 years.

However, the US National Organization of Atmospheric (A...) (NOAA), the Army Corps of Engineers, and the National Research Council, using recently updated data, have all increased their probability ratings for faster and higher sea-level rise scenarios.

In this instance also, the amendments fail to discuss the significant impacts to the WaterFix project if these other scenarios play out.

In closing, I strongly believe that the WaterFix tunnels project itself is deeply flawed. Above I have outlined only two of the many flaws in this proposal. I look forward to future opportunities to point out these flaws.

Thank you.

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